

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

BRADLEY WAYNE JOHNSON,

Defendant.

NO. 2:19-cr-00055-RSM

PROTECTIVE ORDER

This matter having come before the Court on a Stipulated Motion for Entry of a
Discovery Protective Order, the Court hereby enters the following:

DISCOVERY PROTECTIVE ORDER

A. Definitions

As used in this Order, the term “Protected Information” means any date of birth,
Social Security number, driver’s license number, bank account number, credit card
number, personal identification number, address, telephone number, name and/or location
of employment, criminal history record, background check, immigration history/status,
and/or any other similar information or number implicating a privacy interest and
belonging to an individual, business, partnership, or corporation.

“Protected Information” also includes the name of any victim of the charged
offenses or any non-defendant witness.

As used in this Order, the term “Protected Material” means any document or other
record containing or reflecting Protected Information.

B. Procedures

Possession of Protected Information and/or Protected Material is hereby limited to
the attorneys of record in the above captioned case, their respective offices and staff, and

1 their investigators and agents. The attorneys of record and their investigators and agents
2 may review Protected Information and/or Protected Material with the defendant. The
3 defendant may visually inspect and review such documents but shall not be allowed to
4 possess Protected Information (such as unredacted copies of Protected Material or notes,
5 copies, or photographs of such Protected Material containing Protected Information). The
6 Defendant may possess documents from which all Protected Information has been
7 redacted.

8 The attorneys of record and their investigators and agents may review or discuss
9 the contents of documents containing Protected Material with any prospective witness, as
10 long as the attorneys of record and investigators and agents do not share the unredacted
11 documents, or share any Protected Information of victims or witnesses, with any
12 prospective witness.

13 If any Protected Information or Protected Material is filed in court or otherwise
14 disseminated as part of litigation, the parties agree to redact such information prior to
15 filing; unless, based on a party's application prior to filing, the Court finds that an
16 unredacted filing is necessary and appropriate.

17 For redactions, numbers that constitute Protected Information shall be redacted to
18 the last 2-4 digits and names shall be redacted to initials, or otherwise as needed to
19 comply with applicable federal and local rules.

20 The attorneys of record and their investigators and agents shall keep any Protected
21 Material secured whenever the Protected Material is not being used in furtherance of their
22 work in the above-captioned case.

23 All documents containing Protected Material shall be returned to the
24 United States, or destroyed, once all charges are resolved by dismissal or by final
25 conviction.

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2 The parties agree that this Protective Order may be modified, as necessary, by
3 filing with the Court a Stipulated Order Modifying the Protective Order, or by other order
4 of the Court.

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6 DATED this 2nd day of April, 2019.

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11 RICARDO S. MARTINEZ
12 UNITED STATES DISTRICT JUDGE
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17 Presented by:

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19 s/Benjamin T. Diggs

20 BENJAMIN T. DIGGS
21 Special Assistant United States Attorney
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